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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION
13

14 ANGEL FRALEY; PAUL WANG; SUSAN
MAINZER; JAMES H. DUVAL, a minor, by
15 and through JAMES DUVAL, as Guardian ad
Litem; and W.T., a minor, by and through
16 RUSSELL TAIT, as Guardian ad Litem;
individually and on behalf of all others
17 similarly situated,

18 Plaintiffs,

19 v.

20 FACEBOOK, INC., a corporation; and DOES
1-100,
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22 Defendants.
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Case No. CV 11-01726-RS

**DECLARATION OF SANDEEP N. SOLANKI IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION AND NOTICE
TO FILE DOCUMENTS AND PORTIONS OF
DOCUMENTS UNDER SEAL**

[L.R. 79-5(D)]

JUDGE: HON. RICHARD SEEBORG

I, Sandeep N. Solanki, declare:

1. I am a Litigation Counsel employed by Defendant Facebook, Inc. (“Facebook”). I submit this declaration in support of Plaintiffs’ July 6, 2012 Administrative Motion and Notice to File Documents and Portions of Documents Under Seal (Dkt. No. 190) (the “Motion to Seal”). Except as otherwise noted, I have personal knowledge of the facts set forth below, and if called as a witness to testify, could and would testify competently thereto.

2. Plaintiffs’ Motion to Seal seeks to seal information designated as Highly Confidential by Facebook pursuant to the Stipulated Protective Order in this case (Dkt. No. 65) that is included in Plaintiffs’ Opposition to Motion to Intervene (Dkt. No. 191) (the “Opposition to Motion to Intervene”) and in the Declaration of Robert S. Arns in Support of Opposition to Motion to Intervene (Dkt. No. 190-1) (the “Arns Declaration”).

3. I understand that Plaintiffs lodged with the Court highlighted copies of their Opposition to Motion to Intervene and the Arns Declaration showing the proposed redactions to these documents. These redactions consist of confidential and proprietary Facebook business information concerning the capabilities of Facebook’s products and infrastructure that is non-public and that would cause competitive harm to Facebook if not sealed (the “Sealable Information”). This Sealable information is located on the following page and line numbers:

Document	Location	Justification for sealing
Opposition to Motion to Intervene	Page 15, line 11-13; Page 20, line 28 to Page 21, line 2.	This information consists of non-public, confidential information about the capabilities of Facebook’s products and infrastructure, and in particular, the information available in Facebook’s internal historical records.
Arns Declaration	Page 10, lines 5-6	This information consists of non-public, confidential information about the capabilities of Facebook’s products and infrastructure, and in particular, the information available in Facebook’s internal historical records.

4. Public disclosure of this Sealable Information would create the risk of causing competitive harm to Facebook by giving competitors and other third-parties access to

1.

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

In accordance with Civil Local Rule 5-1(i)(3), concurrence in the filing of this document has been obtained from the signatory and I shall maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

Dated: July 16, 2012

COOLEY LLP

/s/ Jeffrey M. Gutkin
Jeffrey M. Gutkin

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